

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

VS

HEATHER SEGURA

§
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§
§
§

7:16-CR-01589-20

MOTION TO MODIFY CONDITIONS OF RELEASE

TO THE HONORABLE JUDGE RICARDO R. HINOJOSA:

COMES NOW, HEATHER SEGURA, DEFENDANT by and through her attorney, Roel R. Trevino & Jose Luis Ramos, and files this motion requesting for this Honorable Court to modify her conditions of release and shows unto this Court as follows:

I.

Defendant, **HEATHER SEGURA**, is presently on pre- trial release and is required to wear an ankle monitor. She has not had any violations of any kind during her time on release. The ankle monitor is no longer necessary to assure compliance of all her other conditions of release including appearance for trial and preventing any violations of law.

II.

The defendant moves the Court order the removal of her ankle monitor.

WHEREFORE PREMISES CONSIDERED, DEFENDANT, **HEATHER SEGURA** prays that the Court modify her conditions of release and order the removal of her ankle monitor as unnecessary to insure her appearance or compliance with all other conditions of release.

Respectfully submitted,

LAW OFFICE OF ROEL R. TREVINO
/s/ Roel R. Trevino
Roel R. Trevino
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S/Jose Luis Ramos

Jose Luis Ramos

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CERTIFICATE OF SERVICE

I, Roel R. Trevino & Jose Luis Ramos, hereby certify that on March 26, 2018, a true and correct copy of the above and foregoing Motion Requesting removal of her ankle monitor was forwarded via e-filing to the Assistant United States Attorney in charge of this case; and all counsel record.

Assistant United States Attorney in charge of this case
is undecided.

Ms. Pat Profit, Assistant U S Attorney

S/Jose Luis Ramos

Jose Luis Ramos

/s/ Roel R. Trevino

Roel R. Trevino

CERTIFICATE OF CONSULTATION

I, ROEL R. TREVINO & JOSE LUIS RAMOS, counsels' for **HEAHTER SEGURA**, hereby certify that on Monday, March 26, 2018 my office contacted the Assistant United States Attorney in charge of this case concerning the filing of DEFENDANT'S MOTION REQUESTING REMOVAL OF HEER ANKLE MONITOR. Ms. Pat Profit, is **UNOPPOSED**.

Consulted with Pre-Trial Services Maria Paredes and has **NO OPPOSITION** to this motion.

S/Jose Luis Ramos

Jose Luis Ramos

/s/ Roel R. Trevino

Roel R. Trevino